

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|-----------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Crim. No.13-10200-GAO |
| |) | |
| DZHOKHAR A. TSARNAEV, |) | |
| Defendant |) | |

**GOVERNMENT'S MOTION FOR LEAVE TO FILE
INFORMATION REQUESTED BY THE COURT (RE: EXPERTS) UNDER SEAL**

The United States of America, by and through its undersigned counsel, respectfully requests leave to file an exhibit containing information requested by the court under seal. As grounds for this motion, the government states that today, September 18, 2014, the Court requested the September 2, 2014 disclosures related to expert witnesses, and the computer forensics report related to the defendant's laptop computer which was included among those materials. This information, which includes and comments upon evidence in the case, is not necessary for public disclosure and is not typically made public pre-trial. Wherefore, this information should remain under seal until such time as their contents are used in court during a relevant hearing or trial of this matter.

The sealed exhibit consists of the following:

1. The government's 28-page September 2, 2014 letter describing the forensic experts previously noticed in narrative detail and the supporting materials accompanying the letter.

2. An Excel spreadsheet index of the supporting materials, including Jencks and underlying materials which the government produced on September 2, 2014. These materials were a reproduction of information related to the government's affirmative experts in a Bates-labeled form and organized by expert. The disc containing the materials referenced in the index is available upon request.
3. Three geo-politics/terrorism expert reports totaling approximately 100 pages referenced in the September 2, 2014 letter.
4. A 53-page FBI report of analysis of the defendant's laptop computer referenced in the September 2, 2014 letter.
5. The defendant's 209 word expert disclosure of September 2, 2014.

Respectfully submitted,

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

By: /s/ Aloke Chakravarty
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Aloke Chakravarty

ALOKE CHAKRAVARTY